

AB:MGD

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

– against –

COMPLAINT  
(T. 31, U.S.C., § 5332)

CHOONOK JEON,

Defendant

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EASTERN DISTRICT OF NEW YORK, SS:

DANICA DUPUY, being duly sworn, deposes and states that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

Upon information and belief, on or about August 21, 2019, within the Eastern District of New York, the defendant CHOONOK JEON did knowingly and with the intent to evade the currency reporting requirements under Title 31, United States Code, Sections 5316(a)(1)(A) and 5316(b), conceal more than \$10,000 in currency and other monetary instruments, to wit, approximately \$631,774 in United States currency and approximately \$75,000 in gold bars, on her person and in articles of luggage and other containers, and transport and transfer and attempt to transport and transfer such currency and monetary instruments from a place within the United States to a place outside of the United States.

(Title 31, United States Code, Section 5332)

The source of your deponent's information and the grounds for her belief are as follows:<sup>1</sup>


1. Your deponent has been with HSI for approximately 10 years. I am familiar with the facts contained in this affidavit as a result of my participation in the investigation of the bulk cash smuggling discussed in this affidavit, which includes, but is not limited to, my review of the file and conversations with other law enforcement personnel assisting with the investigation.

2. On or about August 21, 2019, the defendant CHOONOK JEON, a citizen of the United States of America, attempted to board Korean Airlines flight 86 to Seoul, South Korea, departing from John F. Kennedy International Airport in Queens, New York. During a routine x-ray of JEON's checked luggage, law enforcement officials observed what appeared to be a quantity of United States currency in excess of \$10,000. JEON was traveling with another individual, Passenger-1. Officials also observed what appeared to be a quantity of United States currency in excess of \$10,000 in Passenger-1's checked luggage.

3. At approximately 12:00 a.m. on August 21, 2019, officers from Customs and Border Protection ("CBP"), approached JEON and Passenger-1 in the vicinity of the jetway. The CBP officers, assisted by a Korean interpreter, informed JEON of the currency reporting regulations, and presented a customs form for JEON to read.<sup>2</sup>

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<sup>1</sup> Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause, I have not set forth all the facts and circumstances of which I am aware.


<sup>2</sup> The customs form provided to JEON was printed in ~~English~~ <sup>Korean.</sup> and was  translated for her by the Korean interpreter.

4. After the defendant CHOONOK JEON finished reviewing the customs form and confirmed that she understood it, the CBP officers asked her to declare all of the currency and monetary instruments belonging to her. The CBP officers also informed the defendant that she was required to declare all currency that the defendant was carrying in checked luggage and carry-on luggage, whether in the form of cash, checks, money orders or other negotiable instruments. The defendant then declared that she was transporting \$320,000 in United States currency, which she specified in writing on the FinCEN 105 Form. JEON then produced approximately \$4,800 from her person.


5. The CBP officers also made the same inquiries and request of Passenger-1 (through a Korean interpreter), who likewise confirmed that he understood the form. Passenger-1 declared and specified in writing on the FinCEN 105 Form that he was carrying \$260,000 in cash. Passenger-1 further informed the CBP officers that he was a neighbor of JEON and was carrying the money at JEON's request.

6. Examination of two pieces of luggage checked by the defendant CHOONOK JEON revealed more than \$366,974 in additional United States currency, wrapped in newspaper and carbon paper and concealed inside of cooking pots, as well as five ten-ounce gold bars worth a total of approximately \$75,000 concealed inside of shoes. Examination of the single piece of luggage checked by Passenger-1 revealed an additional \$264,800 in United States currency. A total of approximately \$631,774 in United States currency, as well as approximately \$75,000 in gold bars, was found on the defendant's person, within the defendant's checked baggage and within Passenger-1's checked baggage.

WHEREFORE, your deponent respectfully requests that CHOONOK JEON  
be dealt with according to law.

  
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DANICA DURUY  
Special Agent  
Homeland Security Investigations

Sworn to before me this  
21st day of August, 2019

  
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HONORABLE STEVEN L. TISCIONE  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK